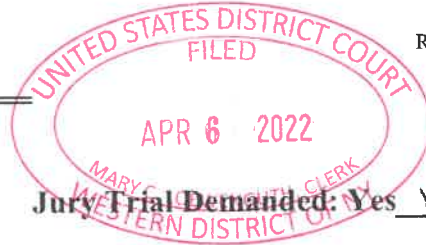


**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK**

Revised 07/07 WDNY

Drinks - Bruder, Sanja



Jury Trial Demanded: Yes ☒ No ☐

Name(s) of Plaintiff or Plaintiffs

-VS-  
Niagara Falls Police Club  
Tuttle, James E, Lee, Michael  
Kerfoot, Steven

Name of Defendant or Defendants

**DISCRIMINATION COMPLAINT**

-CV-

22 CV 268-✓

You should attach a copy of your **original Equal Employment Opportunity Commission (EEOC) complaint**, a copy of the Equal Employment Opportunity Commission **decision**, **AND** a copy of the **"Right to Sue"** letter you received from the EEOC to this complaint. Failure to do so may delay your case.

**Note:** Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.

This action is brought for discrimination in employment pursuant to (*check only those that apply*):

☒ Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (amended in 1972, 1978 and by the Civil Rights Act of 1991, Pub.L.No. 102-166) (race, color, gender, religion, national origin).

**NOTE:** In order to bring suit in federal district court under Title VII, you **must first obtain a right to sue letter** from the Equal Employment Opportunity Commission.

☐ Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621-634 (amended in 1984, 1990, and by the Age Discrimination in Employment Amendments of 1986, Pub.L.No. 99-592, the Civil Rights Act of 1991, Pub.L.No. 102-166).

**NOTE:** In order to bring suit in federal district court under the Age Discrimination in Employment Act, you **must first file charges** with the Equal Employment Opportunity Commission.

☐ Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112-12117 (amended by the Civil Rights Act of 1991, Pub.L.No. 102-166).

**NOTE:** In order to bring suit in federal district court under the Americans with Disabilities Act, you **must first obtain a right to sue letter** from the Equal Employment Opportunity Commission.

**JURISDICTION** is specifically conferred upon this United States District Court by the aforementioned statutes, as well as 28 U.S.C. §§ 1331, 1343. Jurisdiction may also be appropriate under 42 U.S.C. §§ 1981, 1983 and 1985(3), as amended by the Civil Rights Act of 1991, Pub.L.No. 102-166, and any related claims under New York law.

**In addition to the federal claims indicated above**, you may wish to include New York State claims, pursuant to 28 U.S.C. § 1367(a).

✓  
New York State Human Rights Law, N.Y. Exec. Law §§ 290 to 297 (age, race, creed, color, national origin, sexual orientation, military status, sex, disability, predisposing genetic characteristics, marital status).

## PARTIES

1. My address is: 1032 97<sup>th</sup> Street  
Niagara Falls, New York 14304

My telephone number is: 716-628-3286

2. The name of the employer(s), labor organization, employment agency, apprenticeship committee, state or local government agency who I believe discriminated against me is/are as follows:

Name: Niagara Falls Police Club (union)

Number of employees: unknown at this time

Address: 1925 Main Street  
Niagara Falls, New York 14305

3. (If different than the above), the name and/or the address of the defendant with whom I sought employment, was employed by, received my paycheck from or whom I believed also controlled the terms and conditions under which I were paid or worked. (For example, you worked for a subsidiary of a larger company and that larger company set personnel policies and issued you your paycheck).

Name: \_\_\_\_\_

Address: \_\_\_\_\_

## CLAIMS

4. I was first employed by the defendant on (date): N/A

5. As nearly as possible, the date when the first alleged discriminatory act occurred is: November 17 2019
6. As nearly as possible, the date(s) when subsequent acts of discrimination occurred (if any did): Continued for over a period of two years and is continuing.
7. I believe that the defendant(s) All mentioned
- a. ☒ Are still committing these acts against me.
- b. ☐ Are not still committing these acts against me.
- (Complete this next item **only** if you checked "b" above) The last discriminatory act against me occurred on (date) \_\_\_\_\_
8. (Complete this section **only** if you filed a complaint with the New York State Division of Human Rights)
- The date when I filed a complaint with the New York State Division of Human Rights is January 8 2021 / January 11 2021  
 (estimate the date, if necessary)
- I filed that complaint in (identify the city and state): Buffalo, New York
- The Complaint Number was: 10210874
9. The New York State Human Rights Commission did ☒ /did not \_\_\_\_\_ issue a decision. (NOTE: If it **did** issue a decision, you **must attach** one copy of the decision to **each** copy of the complaint; failure to do so will delay the initiation of your case.)
10. The date (if necessary, estimate the date as accurately as possible) I filed charges with the Equal Employment Opportunity Commission (EEOC) regarding defendant's alleged discriminatory conduct is: A Request for EEOC Review was asked 10/13/2021
11. The Equal Employment Opportunity Commission did ☒ /did not \_\_\_\_\_ issue a decision. (NOTE: If it **did** issue a decision, you **must attach** one copy of the decision to **each** copy of the complaint; failure to do so will delay the initiation of your case.)
12. The Equal Employment Opportunity Commission issued the attached Notice of Right to Sue letter which I received on: January 19 2022. (NOTE: If it

**did** issue a Right to Sue letter, you **must** attach one copy of the decision to **each** copy of the complaint; failure to do so will delay the initiation of your case.)

13. I am complaining in this action of the following types of actions by the defendants:

- a. ☐ Failure to provide me with reasonable accommodations to the application process
- b. ☐ Failure to employ me
- c. ☒ Termination of my employment - *relates to*
- d. ☐ Failure to promote me
- e. ☒ Failure to provide me with reasonable accommodations so I can perform the essential functions of my job
- f. ☐ Harassment on the basis of my sex
- g. ☒ Harassment on the basis of unequal terms and conditions of my employment
- h. ☒ Retaliation because I complained about discrimination or harassment directed toward me
- i. ☐ Retaliation because I complained about discrimination or harassment directed toward others
- j. ☒ Other actions (please describe) non representation due to racial discrimination and retaliation. Took away my benefits illegally. Allowed and assisted with legal paperwork being charged.

14. Defendant's conduct is discriminatory with respect to which of the following (check all that apply):

- a. ☒ Race
- b. ☐ Color
- c. ☐ Sex
- d. ☐ Religion
- e. ☐ National Origin
- f. ☐ Sexual Harassment
- g. ☐ Age  
\_\_\_\_\_ Date of birth
- h. ☐ Disability  
Are you incorrectly perceived as being disabled by your employer?  
\_\_\_\_\_ yes \_\_\_\_\_ no

15. I believe that I was ☒ /was not ☐ intentionally discriminated against by the defendant(s).

16. I believe that the defendant(s) is/are ☒ is not/are not \_\_\_\_\_ still committing these acts against me. (If you answer is that the acts are not still being committed, state when: \_\_\_\_\_ and why the defendant(s) stopped committing these acts against you: \_\_\_\_\_)

17. **A copy of the charge to the Equal Employment Opportunity Commission is attached to this complaint and is submitted as a brief statement of the facts of my claim.** (NOTE: You **must** attach a copy of the **original complaint** you filed with the Equal Employment Opportunity Commission and a copy of the **Equal Employment Opportunity Commission affidavit** to this complaint; failure to do so will delay initiation of your case.)

18. The Equal Employment Opportunity Commission (*check one*):

☐ **has not** issued a Right to sue letter

☒ **has** issued a Right to sue letter, which I received on January 19 2022

19. State here as briefly as possible the *facts* of your case. Describe how each defendant is involved, including *dates* and *places*. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (*Use as much space as you need. Attach extra sheets if necessary.*)

There are many dates and times where offenses has taken place over a two year plus period. I was denied service by attorney Robert Boreanaz at urging and request of the union and union attorney James Tuttle who did retain this attorney for me because of a conflict of interest. Union and union attorney had knowledge of an illegal action going to be taken against me by my employer and never informed me and instead worked in conjunction with my employer in an act of retaliation and discrimination against me. Michael Lee (union president)

#### **FOR LITIGANTS ALLEGING AGE DISCRIMINATION**

20. Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding defendant's alleged discriminatory conduct \_\_\_\_\_ 60 days or more have elapsed \_\_\_\_\_ less than 60 days have elapsed

#### **FOR LITIGANTS ALLEGING AN AMERICANS WITH DISABILITIES ACT CLAIM**

21. I first disclosed my disability to my employer (or my employer first became aware of my disability on \_\_\_\_\_)



16. I believe that the defendant(s) is/are ☒ is not/are not \_\_\_\_\_ still committing these acts against me. (If you answer is that the acts are not still being committed, state when: \_\_\_\_\_ and why the defendant(s) stopped committing these acts against you: \_\_\_\_\_)
17. **A copy of the charge to the Equal Employment Opportunity Commission is attached to this complaint and is submitted as a brief statement of the facts of my claim.** (NOTE: You **must** attach a copy of the **original complaint** you filed with the Equal Employment Opportunity Commission and a copy of the **Equal Employment Opportunity Commission affidavit** to this complaint; failure to do so will delay initiation of your case.)
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☐ **has not** issued a Right to sue letter  
☒ **has** issued a Right to sue letter, which I received on January 19 2022
19. State here as briefly as possible the *facts* of your case. Describe how each defendant is involved, including *dates* and *places*. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (*Use as much space as you need. Attach extra sheets if necessary.*)

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21. I first disclosed my disability to my employer (or my employer first became aware of my disability on \_\_\_\_\_)

Page 5

19. during April 9 - May 4 2020 willfully and knowingly used my accrued days to pay me without my authorization while knowing I was collecting unemployment. Michael Lee and I both had full knowledge that I was not allowed to work but was still employed. Steven Kerfoot (union president after Michael Lee stepped down) continued and followed the same discriminatory actions as Michael Lee did after becoming union president. The union denied me affirmative action in a letter written by the union attorney to my attorney that was retained by the union to represent me, but never did. Unwarranted suspensions started after a racial incident that happened at work of which I was the victim. The union has never assisted me properly and has breached it's duty of fair representation arbitrarily and in bad faith due to prejudice and retaliation. Defendants mentioned and others who took discriminatory/retaliatory action against me were white. Let it be known that there are approx. five black union members (if that) out of approx. 65 union members that would really have no say. Many facts are within the attached original complaint. Another important fact is that NYSDHR did purposely arbitrarily disregard evidence submitted by me during the investigation and it was never made part of the case. I was treated unequal and unfair,

22. The date on which I first asked my employer for reasonable accommodation of my disability is \_\_\_\_\_
23. The reasonable accommodations for my disability (if any) that my employer provided to me are: \_\_\_\_\_
24. The reasonable accommodation provided to me by my employer were \_\_\_\_/were not \_\_\_\_ effective.

**WHEREFORE**, I respectfully request this Court to grant me such relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

Dated: April 6 2022

Sanja Drinks-Bruder

Plaintiff's Signature

**ACKNOWLEDGEMENT**

STATE OF New York

COUNTY OF NIAGARA

On the 6<sup>th</sup> day of APRIL in the year 20 22

before me personally came SANJA DRINKS-BRUDER

to me known and known to me to be the person(s) described in and who executed the above instrument and she (they jointly and severally) acknowledged to me that she (they) executed the same

Kathleen M. Drake

KATHLEEN M. DRAKE  
NOTARY PUBLIC STATE OF NEW YORK  
QUALIFIED IN NIAGARA COUNTY  
LIC. #01DR4997544  
COMM. EXP. JUNE 08, 2022





## Division of Human Rights

ANDREW M. CUOMO  
Governor

JOHNATHAN J. SMITH  
Interim Commissioner

February 10, 2021

Sanja Drinks-Bruder  
1032 97th Street  
Niagara Falls, NY 14304

Re: Sanja Drinks-Bruder v. Niagara Falls Police Club, Inc., Michael Lee, James Tuttle, Esq.  
Case No. 10210874

Dear Sanja Drinks-Bruder:

Please be advised that this office has received your complaint. Your filing date is 1/11/2021.

A copy of your complaint, and the determination, will be sent to the U.S. Equal Employment Opportunity Commission (EEOC), so that your complaint may be dual-filed under applicable federal law. Your EEOC charge number is 16GC101031.

To protect your rights, it is essential that the Division be notified promptly of any change in your address or telephone number. A form is enclosed for this purpose.

**Use of email by the Division:** The Division uses email, whenever possible, to communicate with the parties to complaints. This avoids delays and lost mail, and increases the efficiency of Division case processing, particularly as the Division intends to continue to process cases in a timely fashion during the COVID-19 pandemic. Therefore, **you are required to provide your email address** if you have not already done so, and to keep us advised of any change of email address. You can provide your email address by emailing us at [BuffaloOfficeFax@dhr.ny.gov](mailto:BuffaloOfficeFax@dhr.ny.gov) and referencing your case number.

You will be contacted by the Human Rights Specialist assigned to your case when the active investigation of your complaint begins. In the meantime, if you have any questions please call our office at (716) 847-7632, or contact us via e-mail to [BuffaloOfficeFax@dhr.ny.gov](mailto:BuffaloOfficeFax@dhr.ny.gov).

Very truly yours,

A handwritten signature in black ink that reads "Debbie S. Kent".

Debbie S. Kent  
Regional Director

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION  
New York District Office  
33 Whitehall Street, 5th Floor  
New York, New York 10004-2112

Sanja Drinks-Bruder  
1032 97th Street  
Niagara Falls, NY 14304

EEOC Charge Number: 16GC101031  
NYSDHR Case Number: 10210874

**NOTICE**

This office has been informed that you filed a complaint of employment discrimination with the New York State Division of Human Rights (NYSDHR). The purpose of this notice is to inform you of your federal rights pursuant to one or more of the statutes under which you may have filed. Please be advised that your complaint will be investigated by the New York State Division of Human Rights, not the Federal Equal Employment Opportunity Commission (EEOC). All questions, correspondence and status reports with regard to your case must be directed to the New York State Division of Human Rights office where your complaint was filed.

**YOUR FEDERAL RIGHTS** (if you filed under):

- ☒ Title VII of the Civil Rights Act of 1964, as amended – If you want to file a private lawsuit in federal district court with your own private attorney because you do not want the New York State Division of Human Rights to conduct an investigation, you may request from the EEOC a Notice of Right to Sue, 180 days after you have filed your complaint. Once the EEOC grants your request, it is only valid for ninety (90) days from the date the Notice was issued, after which your time to sue expires. If you want the New York State Division of Human Rights to conduct an investigation, you do not need to make this request, or to contact or write either agency. The New York State Division of Human Rights will contact you and/or advise you in the near future of their investigation and determination findings.
- ☐ The Americans with Disabilities Act of 1990 (ADA) – Same as Title VII, above.
- ☐ The Age Discrimination in Employment Act of 1967, as amended (ADEA) – If you want to file a private lawsuit with your own private attorney, you could do so any time after 60 days from the date you filed your complaint with the New York State Division of Human Rights. This is only if you do not want the New York State Division of Human Rights to conduct an investigation, otherwise you do not need to do anything at this time. The New York State Division of Human Rights will contact you and/or advise you in the near future of their investigation and determination findings.

Date: February 10, 2021

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION  
New York District Office  
33 Whitehall Street, 5th Floor  
New York, New York 10004-2112

**EEOC REVIEW PROCEDURE**

If you want the EEOC to review the New York State Division of Human Rights final determination, because you are not satisfied with their final findings, you may request that the EEOC conduct a substantial weight review. This request must be done in writing to the EEOC and within fifteen (15) days from the date you received the New York State Division of Human Rights final determination. Otherwise, we will adopt the state findings.

Your review request must specify the reason(s) why you do not agree with the New York State Division of Human Rights final determination.

Mail your request for substantial weight review to:

Equal Employment Opportunity Commission  
Attn: State and Local Unit  
33 Whitehall Street, 5th Floor  
New York, New York 10004-2112

This address is for review purposes only. Remember, if you have questions concerning the status of your case, you must contact the New York State Division of Human Rights.

Date: February 10, 2021

NEW YORK STATE  
DIVISION OF HUMAN RIGHTS

NEW YORK STATE DIVISION OF  
HUMAN RIGHTS on the Complaint of

SANJA DRINKS-BRUDER,

Complainant,

v.

NIAGARA FALLS POLICE CLUB, INC., MICHAEL  
LEE, JAMES TUTTLE, ESQ.,

Respondents.

VERIFIED COMPLAINT  
Pursuant to Executive Law,  
Article 15

Case No.

**10210874**

Federal Charge No. 16GC101031

I, Sanja Drinks-Bruder, residing at 1032 97th Street, Niagara Falls, NY, 14304, charge the above named respondents, whose address is 1925 Main St., Niagara Falls, NY, 14305 with an unlawful discriminatory practice relating to employment in violation of Article 15 of the Executive Law of the State of New York (Human Rights Law) because of race/color, sex, opposed discrimination/retaliation.

Date most recent or continuing discrimination took place is 1/8/2021.

The allegations are:

SEE ATTACHED





**6. Are you currently working for this company?** NO☐ Yes. Date of hire:

month day year

What is your position?

☐ No. Last day of work:

month day year

What was your position?

☐ I was never hired.

Date of application:

month day year

What position did you apply for?

**7. Basis of alleged discrimination:**

Check **ONLY** the boxes that you believe were the reasons for discrimination, and fill in specifics only for those reasons. Please look at page 2 of "Instructions" for an explanation of each type of discrimination.

☐ **Age:**

Date of Birth: \_\_\_\_\_

☐ **Familial Status:**☐ **Arrest Record**☐ **Military Status:**☐ Active Duty ☐ Reserves ☐ Veteran☐ **Conviction Record**☐ **Marital Status**☐ Single ☐ Married ☐ Separated  
☐ Divorced ☐ Widowed☐ **Creed/ Religion:**

Please specify: \_\_\_\_\_

☐ **National Origin:**

Please specify: \_\_\_\_\_

☐ **Disability:**

Please specify: \_\_\_\_\_

☐ **Predisposing Genetic Characteristic:**☐ **Domestic Violence Victim Status**☐ **Pregnancy-Related Condition:**

Please specify: \_\_\_\_\_

☐ **Gender Identity or Expression, Including the Status of Being Transgender**☐ **Sexual Orientation:**

Please specify: \_\_\_\_\_

☒ **Race/Color or Ethnicity:**Please specify: Black☐ Trait historically associated with race such as hair texture or hairstyle☒ **Sex:**Please specify: female gender

Specify if the discrimination involved:

☐ Pregnancy ☐ Sexual Harassment☐ **Use of Guide Dog, Hearing Dog, or Service Dog**

If you believe you were treated differently after you filed or helped someone file a discrimination complaint, participated as a witness to a discrimination complaint, or opposed or reported discrimination due to any category above, check below:

☒ **Retaliation:** How did you oppose discrimination: By speaking with union and now filing complaint

If you believe you were discriminated against because of your relationship or association with a member or members of a protected category listed above, indicate the relevant category(ies) above, and check below.

☒ **Relationship or association**

**8. Acts of alleged discrimination:** *What did the person/company you are complaining against do? Check all that apply*

<input type="checkbox"/> Refused to hire me	<input type="checkbox"/> Gave me a disciplinary notice or negative performance review	<input type="checkbox"/> Denied my request for an accommodation for my disability, or pregnancy-related condition	<input type="checkbox"/> Sexual harassment
<input type="checkbox"/> Fired me/laid me off	<input checked="" type="checkbox"/> Suspended me	<input type="checkbox"/> Denied me an accommodation for domestic violence	<input type="checkbox"/> Harassed or intimidated me on any basis indicated above
<input checked="" type="checkbox"/> Demoted me	<input type="checkbox"/> Did not call back after lay-off	<input type="checkbox"/> Denied me an accommodation for my religious practices	<input type="checkbox"/> Denied services or treated differently by a temp or employment agency
<input checked="" type="checkbox"/> Denied me promotion/ pay raise	<input type="checkbox"/> Paid me a lower salary than other co-workers doing the same job	<input checked="" type="checkbox"/> Denied me leave time or other benefits	<input type="checkbox"/> Denied a license by a licensing agency
<input checked="" type="checkbox"/> Denied me training	<input checked="" type="checkbox"/> Gave me different or worse job duties than other workers doing the same job	<input type="checkbox"/> Discriminatory advertisement or inquiry or job application	<input checked="" type="checkbox"/> Other: All checked no representation was given by union

took benefits away  
to pay me  
fraudulently

## 9. Description of alleged discrimination

See page 1-7 attached  
and following this page

Tell us more about each act of discrimination that you experienced. Please include dates, names of people involved, and explain why you think it was discriminatory. TYPE OR PRINT CLEARLY.

On 1/10/2020 I (Sanja Drink-Budor) returned to work after taking some time off. I was in a inservice training on this day. During the inservice training I was forced to go to a unscheduled unknown unrepresented meeting that I knew nothing about. When I arrived at Deputy Faso's office I was informed by him it was a section 72 proceeding which I knew nothing about and neither did union president (Michael Lee) as he stated to me. I continued after union stated they did not know what was going on but would give all to the union attorney (James Tuttle) who would handle it and also that I must continue. The meeting was to force me to call a mental and medical doctor that they chose for me to have medical exams. The facts given are relating to the fact that I file many grievances. Those were the reasons why the city (City of Niagara Falls) Chief Licata and Deputy Faso stated I need to have these exams and were unfit for duty. Let it be noted here that it is my right through the collective bargaining agreement to file grievances when a problem with my employment exist. I also have a right to deny to submit to any mental or medical exams when there are no true facts giving reasons why such exams are needed. Believing at the time I had to do so because of what the city told me and union I did make these unwarranted medical exam appointments. I was then given paperwork from Deputy Faso and Michael Lee during this meeting which if needed I can provide you with copies which is Human Rights. On 1/10/2020 Deputy Faso gave me section 72 proceeding law and would not explain it as ~~SPB~~ I asked him to and also a copy of the facts

If you need more space to write, please continue writing on a separate sheet of paper and attach it to the complaint form. **DO NOT WRITE IN THE MARGINS OR ON THE BACK OF THIS FORM.**

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that were given to Niagara Falls Civil Commission and Human Resources by both Deputy Faso and Chief Licata that had no signature on it. Deputy Faso told me it was still a legal document. Union president who was at the entire meeting gave me a letter that union attorney emailed to him that had January 6 2020 date on it. I learned after the meeting and reading the letter given to me from union president on 1/10/2020 that <sup>the</sup> union did give the city an okay to proceed with the section 72 proceeding against me. Let it be known Michael Lee stated to me on 1/10/2020 during the meeting taking place that he did not know what a section 72 proceeding was. This is not true due to the letter given to Michael Lee dated 1/6/2020 that was from union attorney James Tuttle. This letter given to president Lee by attorney Tuttle previous to the 1/10/2020 meeting and given to me by Michael



Lee on 1/10/2020 stating the union was giving the okay to the city to take these unlawful actions against me which proves the union and Michael Lee had previous knowledge and discussions about Section 72 proceedings which Michael Lee on 1/10/2020 claimed to know nothing about it. I also now knew that there is a conflict of interest with attorney Tuttle. Union attorney Tuttle whenever there was a issue with me and my union about grievances and/or disciplinary actions being improperly taken against me he has also represented the union against me when they deny me proper representation. How is this when I am a union member that he is representing? Union attorney Tuttle in a February 2020 letter he wrote to another attorney regarding me did finally admit this which I also have a copy of that he has a conflict of interest which stops him from representing me.



As of the date of this complaint the union and union attorney Tuttle tells me that they are representing me. How? No proactive actions by the union and/or James Tuttle has taken place on my behalf which is almost a year. Union and union attorney allowed the city not to follow procedures and as the union and union attorney are aware of this is causing me financial hardship because I have not been able to return to work since 1/13/2020 although Deputy Faso had stated I could on 2/22/2020. The union allowed the city to force me into this unlawful section 72 proceeding without representation because they all knew of it going to take place and did not inform me prior so that I could be prepared as all knew I was not represented makes it an unlawful procedure (section 72 proceeding). The union and union attorney in February 2020 gave me an attorney that was for representing on section 72 proceeding which was over a month after representation was needed.

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The attorney has also taken no actions regarding the section 72 proceeding to defend me in anyway. I was then surprised in July 2020 to learn by his own statements that the union and union attorney had told him he was limited in representing me which still has not been explained to me. I was told this in July because I needed his help when I filed an application for injunctive relief. After it being filed no one would represent me as I had been told I was represented for section 72 proceedings. Also the union and union attorney told this attorney that he could not represent me in any affirmative action issues which I would have used with your agency (Human Rights) involving case no. 10265717. The union and union attorney still have not from 1/10/20 (or previous) until now has represented me and this is because I am a black female.

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Major example was case 10205717 that was with your agency. I was never spoken with from your agency which also refused to collect the evidence that was needed and that the City refused to give to me or the union refused to get for me. So the proper conference and collection was never completed as it should have been by Human Rights which gave no rights to me for case no. 10205717. The union continues to ignore all my work related issues always and agrees with the city all allows improper disciplinary actions to be taken against me. Now I am being forced as told by the union attorney that I must wait on the city (Christopher Mazar, Esq) before any actions can take place even though my family has been placed in financial harm. The union and the city are willingly working in concert with one another to cause me hardship and to force

me into retirement which is a criminal act. All these improper actions were completed by union and city who are white males and white females including the union attorney who is white male. Let it be known that I only spoke with union president Michael Lee about union issues as no other union officer would speak with me relating to this up to this date 1/8/2021. No one has ever been put through the unlawful disciplinary actions as I have been and the union allows it without representation in the 27 years I have been employed. Especially when I did nothing wrong that allows any disciplinary actions to be given against me. The only reason again is I am a black female that has and will write a complaint/grievance when I must which is all the time because I am always ignored by the city and the union. All these unlawful actions have also been told and

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given to PERB (plus more) that started in 2019 and they have not been fully addressed yet which also allows improper actions to be allowed by the city and union.

Again due to no proper actions by NYS Human Rights with my previous complaints (discrimination) the discrimination is allowed to continue against me that is now effecting my children. I am fit for duty and nothing the city or union has given to me shows I am not fit for duty, need a mental and medical exam or does not need representation for these improper unlawful actions.

Due to the timeframe of the start of this discrimination there is too much to list at this time and <sup>can</sup> be discussed during the scheduled conference and/or hearing that will be made by Human Rights to properly investigate this complaint



**Notarization of Complaint**

Based on the information contained in this form, I charge the herein named respondent(s) with an unlawful discriminatory practice, in violation of the New York State Human Rights Law.

By filing this complaint, I understand that I am also filing my employment complaint with the United States Equal Employment Opportunity Commission under the Americans With Disabilities Act (covers disability related to employment), Title VII of the Civil Rights Act of 1964, as amended (covers race, color, religion, national origin, sex relating to employment), and/or the Age Discrimination in Employment Act, as amended (covers ages 40 years of age or older in employment). This complaint will protect my rights under federal law.

I hereby authorize the New York State Division of Human Rights to accept this complaint on behalf of the U.S. Equal Employment Opportunity Commission, subject to the statutory limitations contained in the aforementioned law.

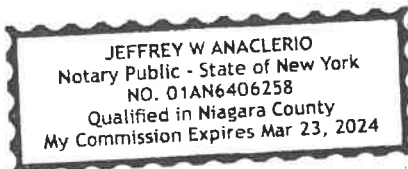
I have not filed any other civil action, nor do I have an action pending before any administrative agency, under any state or local law, based upon this same unlawful discriminatory practice. (If you have another action pending and still wish to file, please contact our office to discuss.)

PLEASE INITIAL   JWB  

I swear under penalty of perjury that I am the complainant herein; that I have read (or have had read to me) the foregoing complaint and know the contents of this complaint; and that the foregoing is true and correct, based on my current knowledge, information, and belief.

Sanya Dink-Bride

Sign your full legal name



Subscribed and sworn before me

This 8th day of January 2021

Signature of Notary Public

County: Erie

Commission expires: 03/23/2021

**Please note: Once this form is completed, notarized, and returned to the New York State Division of Human Rights, it becomes a legal document and an official complaint with the Division.**

NEW YORK STATE  
DIVISION OF HUMAN RIGHTS

NEW YORK STATE DIVISION OF  
HUMAN RIGHTS on the Complaint of

SANJA DRINKS-BRUDER,

Complainant,

v.

NIAGARA FALLS POLICE CLUB, INC., MICHAEL  
LEE, JAMES TUTTLE, ESQ.,

Respondents.

AMENDED VERIFIED  
COMPLAINT

Pursuant to Executive Law,  
Article 15

Case No.

**10210874**

Federal Charge No. 16GC101031

I, Sanja Drinks-Bruder, residing at 1032 97th Street, Niagara Falls, NY, 14304, charge the above named respondents, whose address is 1925 Main St., Niagara Falls, NY, 14305 with an unlawful discriminatory practice relating to employment in violation of Article 15 of the Executive Law of the State of New York (Human Rights Law) because of race/color, sex, opposed discrimination/retaliation.

Date most recent or continuing discrimination took place is 1/8/2021.

The allegations are amended as follows:

**Two pages of additional allegations added, dated stamped received on March 4, 2021.**

1

Sanja Drinks-Brunder  
1032 97th Street

Niagara Falls NY 14304  
March 2 2021

RECEIVED

MAR 04 2021

NYS DIIR BUFFALO  
REGIONAL OFFICE

Division of Human Rights  
65 Court Street Suite 502  
Buffalo, NY 14202

Debbie Kent Regional Director,  
Case No: 10210874

Additional information of discrimination  
involving the Niagara Falls Police Club  
and James Tuttle, Esq.

After filing this report with this division  
my representation (legal) for section 72  
proceedings I have been told by the  
union attorney (Tuttle) which the union is  
allowing to take away my legal representation  
for section 72 proceedings which they  
cannot. I still need section 72 proceedings  
representation given because this case  
is still pending and I have told both the  
union, Mr. Tuttle and the attorney that  
was retained by the union who is Mr.  
Robert Boreanaz, Esq. There has been from  
the retaining date in February 2020 till  
now no defense actions taken for me at  
all. Robert Boreanaz has not given me any  
legal documents ending his representation or  
why if it has. I still want his representation  
for section 72 proceedings. Robert Boreanaz  
Page 1 (continuing is page 2)

2

Case 10210874

states he is waiting on the union to let him know what he can do. Mr. Boreanaz was retained for my defense and not the union as Mr. Tuttle (union attorney) stated to me and Mr. Boreanaz as well as the union in a letter he wrote dated February 12 2020. The 2/12/2020 dated letter allowed the representation because it also was given and approved by the union. After Mr. Boreanaz was retained due to the conflict of interest it now stops Mr. Boreanaz from involving Mr. Tuttle of his representation with me no matter what it would be as long as it pertained to section 72 proceedings. These actions of trying to take away my representation is because I am a black female who reports their actions of discrimination when it happens with me because I am black. let it be known the representation appears there when not needed and not there (representation) when really needed which can be explained in detail as it has been with others.

Sanya Davis-Bruder

RECEIVED

APR 05 2021

NYS DIR BUFFALO  
REGIONAL OFFICE

Sanja Drinks - Bruder  
1032 92<sup>nd</sup> Street

Niagara Falls NY 14304

March 29 2021 changed + correct case # 10210874  
on 4/13/21

Division of Human Rights  
65 Court Street Suite 506  
Buffalo, NY 14202

S. Drinks - Bruder

Debbie Kent Regional Director,  
Case No ~~10210873~~ 10210874 Sanja Drinks - Bruder  
Amendment #2 Page 1 of 3  
"NIAGARA FALLS POLICE CLUB"

On 3/16/2021 the union attorney (Tuttle) with the union showed me through an email that they asked for arbitration for me regarding union matters (representation, pay and unwarranted suspensions). This arbitration set by the union attorney is something that was started by him and I again was never asked before actions were taken. I will not take this arbitration because first it has union matters within it and not any matters (grievances) followed proper procedures. If procedures had been followed as should be the evidence and proof needed would be available for ME to have for this arbitration. The union and union attorney never assisted me properly with any union matters mentioned and now says, well we will represent you on your grievance but whatever the arbitrator



states I (Sanja) must accept and cannot go to court if I would disagree with the arbitrator. I will not accept a demand for arbitration when procedures were not followed and no proper representation was given to me and not "I must accept whatever the outcome" and I cannot appeal it. As far as the concerns about the section 75 and the arbitration relating to it. I must explain about the 75's and why they did occur and continue to occur. The section 75 are a direct result of the section 72 proceeding and the conflict of interest union attorney Tuttle has admitted to which allowed violations of my Weingarten and civil rights, as well as misconduct by Mr. Tuttle and violations of professional ethics. I am forced by the union and Mr. Tuttle to accept what he and the union calls representation. Due to financial hardship I will accept what they wrongly consider proper representation because ~~I~~ must which is Mr. Tuttle for the section 75 but not through a demand for arbitration as Mr. Tuttle and the union are seeking to do. This is another arbitrary, bad faith and discriminatory/retaliatory action that would have me with an attorney who has a conflict of interest (Mr. Tuttle), city attorney (Mr. Mazur) who has never spoken with me about anything from the start of the unlawful section 72 proceeding on 1/10/2020 and

a arbitrator who will likely side with the union and city attorney who both stated many times my grievances have no merit which is not true. The arbitrator will therefore side with the municipality and a professional attorney who are both white rather than a black female with no political or professional connections as they have whom will then not be able to appeal.

Sanyia Dinkins-Bruce  
Petitioner Signature

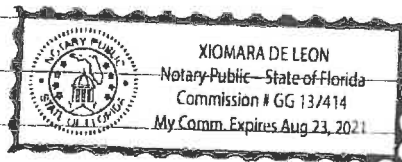
3/30/2021  
date

State of Florida county of Orange

The above petitioner whose name is Sanyia Dinkins-Bruce personally appeared before me and is known by me OR has produced the following identification FL DL on this 30<sup>th</sup> day of March 2021.

Xiomara De Leon  
Notary's Signature

Aug 23 2021  
Commission Expires





**Division of  
Human Rights**

NEW YORK STATE  
DIVISION OF HUMAN RIGHTS

NEW YORK STATE DIVISION OF  
HUMAN RIGHTS on the Complaint of

SANJA DRINKS-BRUDER,

Complainant,

v.

NIAGARA FALLS POLICE CLUB, INC., MICHAEL  
LEE, JAMES TUTTLE, ESQ.,

Respondents.

DETERMINATION AND  
ORDER AFTER  
INVESTIGATION

Case No.  
10210874

Federal Charge No. 16GC101031

On 1/11/2021, Sanja Drinks-Bruder filed a verified complaint with the New York State Division of Human Rights ("Division") charging the above-named respondent with an unlawful discriminatory practice relating to employment because of race/color, sex, opposed discrimination/retaliation in violation of N.Y. Exec. Law, art. 15 (Human Rights Law).

After investigation, and following opportunity for review of related information and evidence by the named parties, the Division has determined that there is NO PROBABLE CAUSE to believe that the respondents have engaged in or are engaging in the unlawful discriminatory practice complained of. This determination is based on the following:

A review of the record does not support complainant's allegation that she was denied proper or adequate representation because of her sex, race/color and/or out of retaliation. A review of the record shows complainant was assigned union and/or outside counsel throughout her Article 72 and Article 75 Proceedings. It appears complainant was not satisfied with the legal advice she received from union and outside counsel, which is not for NYSDHR to investigate, but for her to pursue through the New York State Public Employment Relations Board. There is no evidence to suggest respondent was connected to City of Niagara Falls, Police Department in commencing the Article 72 and Article 75 proceedings, but concluded the City was within its rights to pursue the matter. The evidence in the record does not support a reasonable belief that complainant was discriminated against, denied counsel, or given inadequate counsel because of her race/color, sex or out of retaliation for filing prior internal and external discrimination complaints.

The complaint is therefore ordered dismissed and the file is closed.

PLEASE TAKE NOTICE that any party to this proceeding may appeal this Determination to the New York State Supreme Court in the County wherein the alleged unlawful discriminatory practice took place by filing directly with such court a Notice of Petition and Petition within sixty (60) days after service of this Determination. A copy of this Notice and Petition must also be served on all parties including General Counsel, State Division of Human Rights, One Fordham Plaza, 4th Floor, Bronx, New York 10458. DO NOT FILE THE ORIGINAL NOTICE AND PETITION WITH THE STATE DIVISION OF HUMAN RIGHTS.

Your charge was also filed under Title VII of the Civil Rights Act of 1964. Enforcement of the aforementioned law(s) is the responsibility of the U.S. Equal Employment Opportunity Commission (EEOC). You have the right to request a review by EEOC of this action. To secure review, you must request it in writing, within 15 days of your receipt of this letter, by writing to EEOC, New York District Office, 33 Whitehall Street, 5th Floor, New York, New York 10004-2112. Otherwise, EEOC will generally adopt our action in your case.

Dated:

9-28-2021  
Buffalo, New York

STATE DIVISION OF HUMAN RIGHTS

By:

  
Debbie S. Kent  
Regional Director

NEW YORK STATE  
DIVISION OF HUMAN RIGHTS

NEW YORK STATE DIVISION OF  
HUMAN RIGHTS on the Complaint of

SANJA DRINKS-BRUDER,  
Complainant,

v.

NIAGARA FALLS POLICE CLUB, INC., MICHAEL  
LEE, JAMES TUTTLE, ESQ.,  
Respondents.

AFFIDAVIT OF SERVICE

Case No.  
10210874

Federal Charge No. 16GC101031

STATE OF NEW YORK     )  
COUNTY OF ERIE         )     SS:

Josephine O'Neill, being duly sworn, deposes and says, that he/she is over the age of 18 years; that he/she is employed by the New York State Division of Human Rights; that on September 30, 2021, he/she served the within DETERMINATION upon:

Complainant

Sanja Drinks-Bruder  
1032 97th Street  
Niagara Falls, NY 14304

Respondent

Niagara Falls Police Club, Inc.  
Attn: Legal Department  
1925 Main St.  
Niagara Falls, NY 14305

Respondent

Michael Lee  
Niagara Falls Police Club, Inc.  
1925 Main St.  
Niagara Falls, NY 14305


Respondent

James Tuttle, Esq.  
Niagara Falls Police Club, Inc.  
1925 Main St.  
Niagara Falls, NY 14305

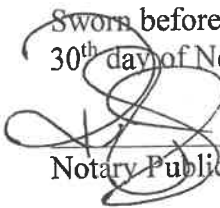


by personally placing true copies of the same, securely enclosed in postpaid wrappers in the post office box/depository under the exclusive care and custody of the United States Postal Service at 65 Court Street, Buffalo, New York.

Dated: September 30, 2021  
Buffalo, New York

  
Josephine O'Neill  
Secretary 1

Sworn before me this  
30<sup>th</sup> day of November, 2021

  
Notary Public

Ruth M. Gonzalez Cruz  
Notary Public, State of New York  
No. 01GO6301439  
Qualified in Erie County  
My Commission Expires 8/2/2022

- 2
3. No witnesses were contacted by NYSDHE.
  4. Evidence given from day of complaint filed through completion of paperwork given for this case which was known to be mailed on September 17 2021 to NYSDHE was not used. The September 17 2021 mailing did include new evidence that NYSDHE did ask for because it was lost or misplaced by them but needed again by them.
  5. Debbie Kent (Regional Director for NYSDHE) signature is very different than past signature's on NYSDHE documents but claim to be the same party. Why?
  6. James Tuttle (union attorney and respondent) was mailed the determination as I was mailed by NYSDHE. But Mr. Tuttle's determination was mailed to the address of the Niagara Falls Police Club which is at the Niagara Falls Police Department's address. This determination was not sent to his office which is in Clifton Park, NY (4 hours plus distance from the Niagara Falls Police Club) as it should have been why was that?
  7. Debbie Kent is the same party who has in the past and continues to dismiss my cases where there is proof and evidence showing discrimination without any hearings being allowed even when asked for on every case.

Thank you,  
 James A. Tuttle - Brader



Saya' Drinks - Bruder  
1032 97th Street  
Niagara Falls NY 14304  
October 13 2021

Equal Employment Opportunity Commission  
New York District Office  
33 Whitehall Street, 5th Floor  
New York, NY 10004-2112

Case No. 10210874  
Federal Charge No 16GC101031

Saya' Drinks - Bruder

N

Complainant

Niagara Falls Police Club, Inc., Michael Lee,  
James Tuttle, Esq

Respondents

I Saya' Drinks - Bruder (complainant) do request that EEOC conduct a review for the complaint/charge mentioned above. I am requesting the review for the following reasons:

1. Supposed documents from respondents were changed illegally by respondents but accepted and allowed by NYSDHR.
2. Civil Rights were violated by various individuals and agencies

EEOC Form 161 (11/2020)

## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

## DISMISSAL AND NOTICE OF RIGHTS

To: **Sanja Drinks-Bruder**  
**1032 97th Street**  
**Niagara Falls, NY 14304**

From: **New York District Office**  
**33 Whitehall Street**  
**5th Floor**  
**New York, NY 10004**



On behalf of person(s) aggrieved whose identity is  
 CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

16G-2021-01031

**Holly M. Shabazz,**  
**State & Local Program Manager**

(929) 506-5316

## THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:



The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge



The EEOC issues the following determination: The EEOC will not proceed further with its investigation, and makes no determination about whether further investigation would establish violations of the statute. This does not mean the claims have no merit. This determination does not certify that the respondent is in compliance with the statutes. The EEOC makes no finding as to the merits of any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

## - NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

**Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act:** This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

**Equal Pay Act (EPA):** EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission



January 6, 2022

Enclosures(s)

**Judy A. Keenan,**  
**District Director**

(Date Issued)

cc:

**Attn: James Tuttle, Esq.**  
**NIAGARA FALLS POLICE CLUB, INC.**  
**1925 Main St.**  
**Niagara Falls, NY 14305**



## CIVIL COVER SHEET

22 CV

268

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

Drinks - Bruder, Sanja R

(b) County of Residence of First Listed Plaintiff Niagara  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Pro Se  
1032 9th Street  
Niagara Falls NY 14304 7166283286

## DEFENDANTS

Niagara Falls Police Club  
Tuttle, James E, Lee, Michael  
Kerfoot, StevenCounty of Residence of First Listed Defendant Niagara  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>INTELLECTUAL PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

## V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

## VI. CAUSE OF ACTION

U.S. Civil Statute 42 U.S.C. 2000e

Brief description of cause:

Denied services relating to employment / no representation

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

4/6/2022

SIGNATURE OF ATTORNEY OF RECORD

Sanja Bruder - Bruder

Pro Se

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE